

HAROLD G. HOPPE 5049  
733 Bishop Street, Suite 2300  
Honolulu, HI 96813  
Telephone: (808) 528-1903

JOHN R. HILLSMAN 71220  
McGuinn, Hillsman & Palefsky  
535 Pacific Avenue  
San Francisco, CA 94133  
Telephone: (415) 421-9292

Attorneys for the Dennis Claypool,  
Sheryl Claypool, Scott Claypool, and Kristen Claypool

UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

DENNIS CLAYPOOL, individually  
and as Guardian Ad Litem for  
KRISTEN CLAYPOOL, a minor,  
SHERYL CLAYPOOL, SCOTT  
CLAYPOOL, and KRISTEN  
CLAYPOOL,

Plaintiffs,

vs.

CAPTAIN ANDY'S SAILING, INC.,  
BLUE DOLPHIN CHARTERS, LTD.  
and BLUE DOLPHIN DIVING,  
INC.,

Defendants.

)  
) Civil No. CV04 00570 HG- BMK  
)  
)

) **CLAYPOOL PLAINTIFFS'**  
) **CERTIFICATE OF**  
) **COMPLIANCE RE**  
) **MEMORANDUM OF POINTS**  
) **AND AUTHORITIES IN**  
) **SUPPORT OF CLAYPOOL**  
) **PLAINTIFFS' MOTION FOR**  
) **APPROVAL OF GOOD FAITH**  
) **SETTLEMENT**

) [Local Rule 7.5]  
)

MATTHEW ISHAM, individually	)	CIVIL NO. CV04-00559 HG-BMK
and as Guardian ad Litem for	)	
HAYDEN ISHAM, a minor;	)	
ROXANNE BEST ISHAM,	)	
	)	
Plaintiffs,	)	
vs.	)	
	)	
BLUE DOLPHIN CHARTERS,	)	
LTD. and BLUE DOLPHIN	)	
DIVING, LTD., CAPTAIN	)	
ANDY'S SAILING, INC.,	)	
	)	
Defendants.	)	

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IN THE MATTER OF THE	)	Civil No. CV05-00037 HG BMK
COMPLAINT OF BLUE DOLPHIN	)	
CHARTERS, LTD. AND TERRY	)	
DONNELLY, AS OWNERS OF	)	
THE VESSEL M/V BLUE	)	
DOLPHIN, O/N 1082212, FOR	)	
EXONORATION FROM AND/OR	)	
LIMITATION OF LIABILITY	)	

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1. This Memorandum of Points and Authorities complies with the type-volume limitation of Local Rule 7.5(b) in that it contains 8,862 words, excluding the parts of the Concise Statement exempted by Local Rule 7.5(d).

2. This Memorandum complies with the typeface and type style

requirements of Local Rule 10.2 in that it has been prepared in a proportionally spaced typeface using WordPerfect version 8 in Times New Roman in a 14-point font.

Dated: April 7, 2006



JOHN R. HELLSMAN